

FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-7303
TRIDENT SEAFOODS CORPORATION
BELLINGHAM PRODUCTION FACILITY

GENERAL INFORMATION	
Applicant	Trident Seafoods Corporation
Facility Name and Address	Trident Seafoods – Bellingham Production Facility 2825 Roeder Avenue Bellingham, WA 98226
Mailing Address	5303 Shilshole Avenue NW Seattle, WA 98107
Type of Facility	Seafood Processing
Facility Discharge Location	Latitude: 48° 43' 11" N Longitude: 122° 30' 30" W
Treatment Plant Receiving Discharge	City of Bellingham, Post Point Pollution Control Plant WA002928-9
Contact at Facility	Gary Haferkorn 360-734-8900 garyhaferkorn@tridentseafoods.com
Responsible Official	William W. Graves, General Manager

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-7303. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to the City of Bellingham's Post Point Pollution Control Facility. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before final issuance. There is no public comment period because this permit contains no increases in discharge or substantial changes since the last permit.

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

Trident Seafoods Corporation - Bellingham Production Facility, is located on the Squalicum Fill on Bellingham Bay. Trident currently leases processing space in two buildings, from Bellingham Cold Storage (map attached).

FishHouse processing wastewater discharges to outfall #001.

Cannery Building processes discharge to outfall #002.

Packaging materials are kept in covered, dry storage areas.

INDUSTRIAL PROCESSES

Trident processes fresh and frozen salmon and frozen pollock fillets, cod fillets, halibut, mahi mahi, and swordfish. Finished product includes fillets, portions, steaks, fresh and frozen salmon roe and canned salmon. The type and amount of seafood processed varies seasonally. A normal operating day is 8 hours a day, 5 days a week. During fresh fish season, operations occur up to 16 hours a day, 7 days a week.

Wastewater flows vary seasonally. Oils, solvents and cleanup and sanitation chemicals are stored in covered containment areas. Waste fiber is stored outside prior to recycling. Fish waste is hauled daily for rendering.

Best management practices (BMPs) at the facility include pre and post production clean-up and daily inspections of the screens and sumps. All screens are cleaned periodically throughout the day and prior to the final daily clean-up.

Processes which generate wastewater include frozen product thawing, glazing, ice melting, fresh fish cleaning, and daily clean-up activities.

TREATMENT PROCESSES

Treatment consists of coarse floor screens, followed by fine screening. The waste water flows from the collection sumps, through the fine screens, and into the City of Bellingham wastewater conveyance system.

The FishHouse (outfall #001) is located on Squalicum Harbor, on the northwest side of the BCS complex. All of the processing effluent is diverted to a screened sump consisting of a large collection basket and two – ½-inch screens. The dual screen system allows for the removal of one screen while cleaning the other, without passing unscreened wastewater to the sanitary sewer system.

The Cannery Building (outfall #002) is located at the southwest corner of the BCS complex. The sump filtering screen consists of a single fine mesh metal belt that is equivalent to a ¼-inch screen, and is located inside on the west end of the building. Waste water is further screened from July through November using a 40 mesh, rotary hydrosieve, located adjacent to each area.

PERMIT STATUS

The previous permit for this facility was issued on November 13, 2000.

An application for permit renewal was submitted to the Department on May 4, 2005, and accepted by the Department on May 9, 2005.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received a permit compliance inspection on November 22, 2004.

During the history of the previous permit, the Permittee has remained in compliance based on Discharge Monitoring Reports (DMRs) and other reports submitted to the Department and inspections conducted by the Department.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the permit application and in Discharge Monitoring Reports. The wastewater discharge is characterized for the following parameters, based on the past two years of submitted data:

Parameter	Outfall #001		Outfall #002	
	Average Concentration	Range	Average Concentration	Range
Flow #001-#002, gpd	37,104	4,677 - 90,877		
BOD ₅ , mg/L	252	3 - 840	190	30 - 420
TSS, mg/L	102	2 - 220	60.9	8.5 - 160
pH, standard units	6.69 - 6.74	6.0 - 8.6	6.66 - 6.71	6.4 - 7.8

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Waste water must be treated using all known available and reasonable treatment (AKART) and not interfere with the operation of the POTW.

Local limits have not been developed by or for the Bellingham WWTP.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

Pollutant concentrations in the proposed discharge with technology-based controls in place are not expected to cause problems at the receiving POTW, such as interference, pass-through or hazardous exposure to POTW workers, nor is it expected to result in unacceptable pollutant levels in the POTW's sludge.

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Federal categorical limitations specifically applicable to raw material already cleaned and frozen do not exist. There are no pretreatment limitations for new or existing sources discharging to a sanitary sewer system listed in 40 CFR Part 408, for this industry. State regulations under Chapter 173-216 WAC require the use of all known available and reasonable methods of treatment (AKART) for all wastewater. The following permit limitations are necessary to satisfy the requirement for AKART:

All process wastewater, including clean-up water, must be screened through coarse screening followed by fine mesh screen prior to discharge to the Post Point WWTP. Wastewater samples shall be taken after passing through the fine mesh screens.

The pH must be between 6.0 and 9.0 standard units.

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED 11/13/00

Parameter	Existing Limits	Proposed Limits
Flow, gpd	150,000	100,000
BOD ₅ , mg/L	report only	report only
TSS, mg/L	report only	report only
pH, standard units	6.0 - 9.0	6.0 - 9.0

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110). The proposed permit requires monitoring from outfall #001 and outfall #002.

The monitoring schedule is detailed in the proposed permit under Conditions S2 and S3. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

Monitoring has been changed from quarterly to monthly to further characterize the impacts to the POTW.

OTHER PERMIT CONDITIONS

REPORTING AND RECORD KEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 173-216-110 and 40 CFR 403.12 (e), (g), and (h)).

OPERATIONS AND MAINTENANCE

The proposed permit contains Condition S.5 as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE CONTROL PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste.

This proposed permit requires, under the authority of RCW 90.48.080, that the Permittee update the solid waste control plan designed to prevent solid waste from causing pollution of the waters of the state and submit it to the Department.

NONROUTINE AND UNANTICIPATED DISCHARGES

Occasionally, this facility may generate waste water which is not characterized in their permit application because it is not a routine discharge and was not anticipated at the time of application. The permit contains an authorization for nonroutine and unanticipated discharges. The permit requires a characterization of these waste waters for pollutants and examination of the opportunities for reuse. Depending on the nature and extent of pollutants in this waste water and opportunities for reuse, Ecology may authorize a direct discharge to the municipality, require the waste water to be placed through the facilities wastewater treatment process or require the water to be reused.

SPILL PLAN

The proposed permit requires the Permittee to develop and implement a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs.

The Permittee has developed a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs. The proposed permit requires the Permittee to update this plan and submit it to the Department.

SLUG DISCHARGE CONTROL PLAN

The Department has determined that the Permittee has the potential for a batch discharge or a spill that could adversely effect the POTW, therefore, a slug discharge control plan is required (40 CFR 403.8 (f)).

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending, or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes, or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for a term of 5 years.

REFERENCES FOR TEXT AND APPENDICES

Washington State Department of Ecology.

Laws and Regulations (<http://www.ecy.wa.gov/laws-rules/index.html>)

Permit and Wastewater Related Information

(<http://www.ecy.wa.gov/programs/wq/wastewater/index.html>)

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page one of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of the application and permit was not required because there are no increases or substantial changes in this permit.

Further information may be obtained from the Department by telephone, (425) 649-7201, or by writing to the address listed above.

This permit was written by Lori LeVander.

APPENDIX B—GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)—Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the state. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD₅—Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD₅ is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling—A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling—A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be “time-composite” (collected at constant time intervals) or “flow-proportional” (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots).

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building; construction of residential houses, office buildings, or industrial buildings; and demolition activity.

Continuous Monitoring—Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business; from the development of any natural resource; or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference—A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent state or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) [including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA)], and including state regulations contained in any state sludge management plan prepared pursuant to Subtitle D of the SWDA], sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)—The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through—A discharge which exits the POTW into waters of the state in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of state water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User—A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day; or
- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass-through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)—A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)—

- 1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; and
- 2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement [in accordance with 40 CFR 403.8(f)(6)].

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a nonroutine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a stormwater drainage system into a defined surface waterbody, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)—Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.